

# Exhibit 2

IN THE CIRCUIT COURT OF THE 11<sup>TH</sup>  
JUDICIAL CIRCUIT, IN AND FOR  
**MIAMI-DADE COUNTY, FLORIDA**

GENERAL JURISDICTION DIVISION

CASE NO:

JOVANNA GARCIA VASQUEZ,

Plaintiff,

vs.

UNITED STATES POSTAL SERVICE  
and DAVID RODRIGUEZ,

Defendants.

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**COMPLAINT FOR DAMAGES**

**COMES NOW**, Plaintiff, JOVANNA GARCIA VASQUEZ, by and through her undersigned attorney, and sues the Defendants, DAVID RODRIGUEZ and UNITED STATES POSTAL SERVICE (hereinafter “U.S.P.S”) and as grounds thereof would state as follows:

1. This is an action for damages in excess of Fifty Thousand (\$50,000.00) Dollars.
2. Plaintiff, JOVANNA GARCIA VASQUEZ, is over the age of eighteen (18) and resides in Miami-Dade County, Florida.
3. That all conditions precedent to the bringing of this action have been complied with and/or waived.
4. On or about April 24, 2022 Defendant, U.S.P.S owned a motor vehicle 2022 Mercedes with VIN W1XV0BEM9N3935357 in Miami-Dade County, FL.
5. At all times material hereto, the Defendant, U.S.P.S, was responsible for the actions of their employee, Defendant, DAVID RODRIGUEZ, who was working within the course and scope of his employment at the time of the subject occurrence.

6. At that same time and place, on April 24, 2022, at or around SW 162 Ave. Defendant, DAVID RODRIGUEZ, negligently, carelessly, and recklessly operated and maintained the above-described motor vehicle he was driving, so that it crashed into and violently collided with the motor vehicle being driven by Plaintiff, JOVANNA GARCIA VASQUEZ.

**COUNT I**  
**NEGLIGENCE OF DEFENDANT,**  
**DAVID RODRIGUEZ**

Plaintiff re-asserts and re-alleges each allegation set forth in paragraphs 1 through 6, as though fully set forth herein, and further alleges:

7. As a direct and proximate result of the negligence of Defendant, DAVID RODRIGUEZ, Plaintiff, JOVANNA GARCIA VASQUEZ, suffered bodily injuries and resulting pain therefrom, disability, disfigurement, mental anguish, a permanent and significant loss of an important bodily function, loss of capacity for the enjoyment of life, incurred the expense of hospitalization, medical and nursing care and treatment, her working ability was impaired and she suffered loss of earnings, loss of ability to earn money, and aggravation of known and unknown pre-existing conditions or disease. The losses are permanent and continuing and Plaintiff, JOVANNA GARCIA VASQUEZ, will suffer the losses in the future.

**WHEREFORE**, Plaintiff, JOVANNA GARCIA VASQUEZ, demands judgment for damages against Defendant, DAVID RODRIGUEZ, and demands trial by jury of any and all issues triable as a matter of right by jury.

**COUNT II**  
**NEGLIGENCE OF DEFENDANT,**  
**U.S.P.S**

Plaintiff re-asserts and re-alleges each and every allegation set forth in paragraphs 1 through 6, as though fully set forth herein, and further alleges:

7. At all times material hereto, and specifically on or about April 24, 2022, the Defendant, DAVID RODRIGUEZ, was an employee, agent, and/or servant of Defendant, U.S.P.S and was acting within the course and scope of his employment and/or agency with Defendant, U.S.P.S
8. Defendant, U.S.P.S was the registered owner of a motor vehicle being driven by Defendant, DAVID RODRIGUEZ, on or about April 24, 2022.
9. Defendant, U.S.P.S is vicariously liable for the negligent acts and omissions of the Defendant, DAVID RODRIGUEZ , under the doctrine of respondeat superior and/or agency.
10. As a direct and proximate result of the negligence of Defendant, DAVID RODRIGUEZ, and the resulting vicarious liability of Defendant, U.S.P.S Plaintiff, JOVANNA GARCIA VASQUEZ, sustained serious bodily injury that is permanent within a reasonable degree of medical probability, along with resulting pain and suffering; disability; physical impairment; disfigurement; mental anguish; inconvenience; loss of capacity for the enjoyment of life; expense of hospitalization; medical and nursing care and treatment; loss of earnings; loss of ability to earn money; and/or aggravation of a previously existing condition. These losses are either permanent or continuing and Plaintiff, JOVANNA GARCIA VASQUEZ, will suffer these losses in the future.

**WHEREFORE**, Plaintiff, JOVANNA GARCIA VASQUEZ, demands judgment for damages against Defendant, U.S.P.S, and demands trial by jury of any and all issues triable as a matter of right by jury.

**THE FOUNDERS LAW, P. A**

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